

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 24-2317-INV

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| Investigation of the Energy Savings Account and Customer Credit programs pursuant to 30 V.S.A. 209(d)(3)(C) |  |
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Order entered: 06/05/2025

**ORDER ADDRESSING THE ENERGY SAVINGS ACCOUNT PROGRAM  
AND CUSTOMER CREDIT PROGRAM**

**I. BACKGROUND AND INTRODUCTION**

This case concerns the implementation of changes to the Energy Savings Account (“ESA”) program and the Customer Credit Program (“CCP”) pursuant to Public Act 142 of the 2024 Vermont legislative session. Pursuant to 30 V.S.A. § 209(d)(3)(C), these programs allow customers that meet certain eligibility standards to use a percentage of their annual energy efficiency charge (“EEC”) contributions to self-administer energy efficiency as a substitute for participation in energy efficiency utility (“EEU”) programs.

In today’s order, the Vermont Public Utility Commission (“Commission”) approves the program design elements document (the “Program Document”) filed by the Vermont Department of Public Service (“Department”), with some editorial corrections. We also approve the application forms filed by the Department, with changes to remove the collection of certain information and to require that applications be filed through the Commission’s online case management system (known as ePUC). We request that the Department file revised, fillable pdf versions of the ESA and CCP application forms and the existing participant attestation form as compliance filings in this case by June 13, 2025.

Additionally, we accept the Department’s proposal for screening non-electric efficiency measures. We also provide guidance on expectations regarding tracking the \$2,000,000 and \$1,000,000 program caps for the ESA program and the CCP, respectively, and request that the Department and the EEUs provide a reporting mechanism in response to this order. Lastly, we set application deadlines for potential ESA and CCP participants and deadlines for filing recommendations by the Department and the EEUs.

## **II. PROCEDURAL HISTORY**

On March 12, 2025, the Commission issued an order (“March 12<sup>th</sup> Order”) addressing the proposed program design changes to the ESA and the CCP that were filed by the Department. We set a deadline for the Department to file proposed application templates and program design elements to implement the programs. We also indicated that we would provide further guidance on filing procedures after the Department files the proposed application templates. Lastly, we requested comments on the process to screen non-energy-efficiency measures.

On April 3, 2025, the Department filed comments addressing screening non-energy-efficiency measures. No other comments on this topic were filed.

On April 11, 2025, the Department filed proposed application forms and the Program Document as set forth in the March 12 Order. The Department states that it shared these documents with Efficiency Vermont, the City of Burlington Electric Department (“BED”), Associated Industries of Vermont, and representatives of current program participants. The Department represents that it has addressed the comments it received from these parties in the Program document filed with the Commission. The Commission did not receive any comments on these documents.

## **III. DISCUSSION**

### **Program Document**

The Program Document filed by the Department addresses the ESA program and the CCP. We appreciate the Department’s efforts to develop this guidance document and to incorporate feedback from the EEUs and program participants.

We note that there are some minor formatting issues that we request the Department to correct before using the document for program implementation, including starting the document numbering at 1) instead of 2) under the CCP section. Additionally, the Department is requested to remove the use of “PUC” and use “Commission” only. The document also refers to “enrollment form” rather than “application form.” For consistency, it would be appropriate to refer to an “application form” to align with the title of that document. We also request that the Department add header or footer language stating that this document was developed by the

Vermont Department of Public Service and indicating the date on which the document was last updated.

With the changes described above, we approve the Program Document and authorize the Department to make non-substantive changes to the document without further Commission approval.

### **Application Forms and Procedures**

#### *New Participants*

The Department developed separate application forms for participation in the ESA program and the CCP. These application forms vary only slightly to address the programmatic differences. The proposed application forms require that the applicant provide potentially business-sensitive or confidential information such as utility account numbers and utility bill documentation. This information does not need Commission review or approval and is not necessary for the Commission to collect for program implementation.

Accordingly, the Department is requested to remove the information requested under sections 9 through 11 under “Electric Account Information.” Thus, this page of the application form collects only “Electric Utility” and “Annual Cost of Total Energy Efficiency Charge (EEC) (Actual or average over three years)” from all relevant accounts. The form should be revised to require that the applicant separately share this information with Efficiency Vermont for accounting and verification purposes. Additionally, the application form should be revised to direct the applicant to file documentation of EEC charges with Efficiency Vermont.

All applications must be filed with the Commission in ePUC. The application process in ePUC will require the applicant to select a new petition case, with a filing type of “ESA Application” or “CCP Application.” The required information will include (1) the applicant’s name, mailing address, and phone number; (2) the applicant’s official representative’s name, email address, mailing address, and phone number; (3) the name(s) of the applicant’s electric utility or utilities; and (4) a completed pdf version of the application form. Notification of the filing will be made through ePUC to the Department, the applicant’s selected electric utilities, and Efficiency Vermont or BED, as appropriate. The Department is requested to update the application form according to this application process.

With the changes described above, we approve the application forms. As with the Program Document, the Department is authorized to make non-substantive changes to these documents without further Commission approval. The Department is requested to file revised, fillable pdf versions of the ESA and CCP application forms as compliance filings in this case by June 13, 2025.

### *Existing Participants*

Our March 12 Order also adopted the Department's recommendation that it propose a simplified application process for existing ESA and ESA pilot program participants. The Department proposes that Efficiency Vermont send a list of eligible accounts to the current ESA/ESA pilot participants and that these participants attest to the following:

Participant confirms that the accounts listed above are the accounts that will be included in the Energy Savings Account Program. The Participant also agrees to follow all Commission rules governing ESA, including those in the March 12, 2025, Order in Case No. 24-2317-INV, and all requirements in the Energy Savings Account and Customer Credit Program Guidelines.

We accept the Department's proposed simplified application process for existing ESA and ESA pilot program participants. However, the existing participants are also required to file a new petition case with the Commission in ePUC. The applicant will select a filing type of "ESA Application." There will be an option for the applicant to select that it is an existing ESA participant and the applicant should attach the above attestation in place of the application form. The Department is requested to file a fillable pdf version of the existing participant attestation form as a compliance filing in this case by June 13, 2025.

### **Future Filings in ePUC**

Once an ESA or CCP application is filed in ePUC, the Department and the EEU's will be provided with an opportunity to file comments or recommendations on whether the Commission should approve an applicant's participation in the relevant program and any other related information. These comments will be filed in the existing ePUC petition case for each applicant. Additionally, the Program Document states that Energy Management Plans ("EMPs"), if applicable, must be filed with the Commission. EMPs must be filed in the existing ePUC petition case for each applicant.

**Screening Non-Electric Efficiency Measures**

In the March 12 Order, we requested comments addressing (1) whether ESA and CCP participants should be able to hire a consultant to conduct the necessary screening; (2) whether the Department has sufficient capability to conduct the screening; and (3) whether the EEU should receive a reduced percentage of EEC funding if it is not conducting the screening.

The Department recommends that if an ESA or CCP participant proposes a non-energy-efficiency measure that does not have an existing methodology for screening, such as a storage project, the Department and EEUs will work together to develop a consistent methodology to be used for that measure and the same measures in the future. The Department is concerned that if the participants hire independent consultants to conduct the screening there may not be a consistent methodology applied. The Department explains that it does not currently have sufficient capacity to develop screening methodologies for all potential non-energy-efficiency measures before such a measure is proposed by a program participant. The Department instead recommends that methodologies be developed at the time the measure is proposed. This approach would avoid a costly and time-consuming process that may not be necessary if those measures are never implemented.

In addition, the Department recommends that an increased portion of the available EEC funding be allocated to the Department to conduct any necessary screening work. The Department recommends determining the additional allocation of funding at the time new measures are proposed.

We accept the Department's proposal that it and the EEUs work together to develop a screening methodology for non-energy-efficiency measures that do not have an existing screening methodology. We agree that it is appropriate to develop a screening methodology only when a measure is proposed by a participant rather than to spend resources proactively to do so. We expect that the Department will request Commission approval for it to be allocated an increased portion of EEC funding when appropriate to cover necessary costs.

**Tracking Program Caps**

Section 209(d)(3)(C) limits the total annual amount of customer EEC funds that can be placed into an ESA program or the CCP to \$2,000,000 and \$1,000,000, respectively. We expect

that the Department and the EEUs will be tracking the total annual amount of EEC funds for the ESA and CCP. We request the Department and the EEUs to make a filing by July 3, 2025, regarding the appropriate reporting mechanism for conveying this information to the Commission.

**Application Deadlines and Due Dates for Recommendations**

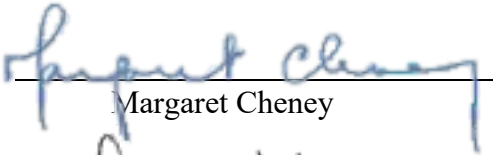
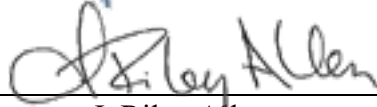
Existing ESA and ESA pilot program participants must file applications in ePUC by July 18, 2025. The deadline for the relevant EEU and the Department to file recommendations on the continuance of participation is August 7, 2025. The enrollment period for these participants will be through December 31, 2029.

New ESA applicants must file application forms in ePUC by July 18, 2025. The deadline for the relevant EEU and the Department to file recommendations with respect to eligibility and application acceptance into the ESA program is August 20, 2025. The enrollment period for these participants would be from January 1, 2027, through December 31, 2029. These participants are eligible to participate in other EEU programs until the enrollment period begins.

CCP applicants must file application forms in ePUC by July 18, 2025. The deadline for the relevant EEU and the Department to file recommendations with respect to eligibility and application acceptance into the CCP is August 20, 2025. The enrollment period for these participants would be from the date of the Commission's order authorizing participation in the CCP through December 31, 2029.

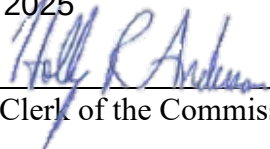
**SO ORDERED.**

Dated at Montpelier, Vermont, this 5th day of June, 2025.

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|------------------------------------------------------------------------------------|---|----------------|
|  | ) |                |
| Edward McNamara                                                                    | ) | PUBLIC UTILITY |
|                                                                                    | ) |                |
|  | ) |                |
| Margaret Cheney                                                                    | ) | COMMISSION     |
|                                                                                    | ) |                |
|  | ) |                |
| J. Riley Allen                                                                     | ) | OF VERMONT     |

OFFICE OF THE CLERK

Filed: June 5, 2025

Attest:   
Clerk of the Commission

*Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: [puc.clerk@vermont.gov](mailto:puc.clerk@vermont.gov))*

*Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.*

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